

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAUDI ARABIAN AIRLINES CORPORATION,

Plaintiff,

– against –

IAGCAS, LLC,

Defendant.
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1:21-cv-06971 (NRB)(OTW)

ECF Case

~~PROPOSED~~
**CIVIL CASE MANAGEMENT
AND SCHEDULING ORDER**

This ~~proposed~~ Civil Case Management Plan and Scheduling Order is submitted by the parties in accordance with Fed. R. Civ. P. 16(b) and Fed. R. Civ. P. 26(f)(3).

1. All parties do not consent to conducting all further proceedings before a United States Magistrate Judge, including motions and trial. 28 U.S.C. § 636(c). The parties are free to withhold consent without adverse substantive consequences.
2. Settlement discussions have taken place.
3. The parties have conferred pursuant to Fed. R. Civ. P. 26(f).
4. Amended pleadings may not be filed and additional parties may not be joined except with leave of the Court. Any motion to amend or to join additional parties shall be filed within 30 days from the date of this Order.
5. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be served no later than 14 days from the date of this Order.
6. Discovery
 - a. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York.
 - b. The parties are to discuss, if and as appropriate, provisions for the disclosure, discovery, or preservation of electronically stored information (ESI). Any agreement reached between the parties concerning ESI is to be filed within 30 days from the date of this Order.
 - c. The parties are to discuss whether a procedure for designating materials as confidential is necessary in this matter. Any agreement between the parties for designating materials as confidential must conform to the Court's Individual Rules of Practice in Civil Cases ("Individual Rules") regarding the filing of materials under seal. Any confidentiality agreement between the parties is to be filed within 30 days from the date of this Order.

- d. The parties are to discuss protocols for asserting claims of privilege or of protection as trial-preparation material after such information is produced, pursuant to Federal Rule of Evidence 502. Any agreement reached between the parties concerning such protocols is to be filed within 30 days from the date of this Order.
- e. All fact discovery shall be completed no later than July 29, 2022.
- f. All expert discovery, including reports, production of underlying documents, and depositions, shall be completed no later than September 23, 2022.

7. Interim Discovery Deadlines

- a. Initial requests for production of documents shall be served by December 29, 2021.
- b. Interrogatories pursuant to Rule 33.3(a) of the Local Civil Rules of the Southern District of New York shall be served by December 29, 2021. No Rule 33.3(a) interrogatories need to be served with respect to disclosures automatically required by Fed. R. Civ. P. 26(a).
- c. Unless otherwise ordered by the Court, contention interrogatories pursuant to Rule 33.3(c) of the Local Civil Rules of the Southern District of New York must be served no later than 30 days before the close of discovery.
- d. Depositions of fact witnesses shall be completed by July 15, 2022.
 - i. Absent an agreement between the parties or an order from the Court, depositions are not to be held until all parties have responded to initial requests for document production.
 - ii. There is no priority in deposition by reason of a party's status as a plaintiff or a defendant.
 - iii. The parties shall meet and confer on a schedule for depositions.
 - iv. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.
- e. Requests to admit shall be served by June 29, 2022.
- f. Any of the deadlines in paragraphs 7(a) through 7(e) may be extended by the written consent of all parties without application to the Court, provided that all fact discovery is completed by the date set forth in paragraph 6(e).
- g. No later than 30 days prior to the date in paragraph 6(e) (i.e., the completion of all fact discovery), the parties shall meet and confer on a schedule for expert disclosures, including reports, production of underlying documents, and depositions. All expert discovery shall be completed by the date set forth in paragraph 6(f).

8. All motions and applications shall be governed by the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York, and the Court's Individual Rules, which are available at <https://www.nysd.uscourts.gov/hon-naomi-reice-buchwald>.
9. The parties shall file any dispositive motions, including those for summary judgment, no later than October 24, 2022.
10. Per the Court's Individual Rules, the Court will set an individual schedule for filings prior to trial covering the subjects of pretrial orders, jury charges, *in limine* motions, proposed findings of fact and conclusions of law, and pretrial memoranda as appropriate.
11. This case is not to be tried to a jury.

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SO ORDERED.



NAOMI REICE BUCHWALD
United States District Judge

Dated: November 29, 2021
New York, New York